

Federal Communications Commission

WASHINGTON, D.C. 20554

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In the matter of

Establishing an Advisory)
Committee to Negotiate)
Regulations for the Provision)
of Mobile Satellite Services)
in the 1610-1626.5 MHz and)
2483.5-2500 MHz Frequency Bands)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket No. 92-166

To: The Commission

REPLY COMMENTS OF TRW INC.

TRW Inc. ("TRW"), by undersigned counsel, hereby replies to comments filed in response to the Commission's August 7, 1992 Public Notice in the above-referenced proceeding (DA 92-1085). TRW wishes simply to underscore the need to limit committee participation only to truly affected parties. In addition, TRW responds to Motorola's misguided suggestion that the CDMA applicants must agree to a homogeneous spectrum sharing plan prior to the commencement of the Advisory Committee's deliberations.

TRW cautioned the Commission in its Comments not to burden the work of the Advisory Committee by adding non-affected parties to its membership. In the Public Notice, the Commission listed proposed affected parties who would provide an adequate balance of interests and perspectives. TRW urges the Commission not to alter this list.

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Some additional parties have requested to participate because of concern with the introduction of mobile satellite services in those portions of the 1610 - 1626.5 MHz frequency band where the Russian GLONASS navigation satellite system operates.^{1/} These commentators, however, overlook the Final Acts of WARC-92, which modified the Table of Allocations to ensure that mobile satellite systems operating in the 1610 - 1626.5 MHz frequency band must operate at power levels which do not interfere with navigation satellite systems such as GLONASS. Additional parties are not needed on the Advisory Committee to represent an issue which was resolved at WARC-92.

In its Comments, Motorola urged the Commission to require the CDMA LEO MSS/RDSS applicants to agree on a common system design and homogeneous spectrum sharing plan before the Advisory Committee initiates its deliberations. This is a patently absurd suggestion which must be rejected for the "red herring" that it is. Spectrum sharing is one of the two issues which the Commission identified for the Advisory Committee to study and make recommendations. Why, then, would Motorola suggest that the CDMA applicants must agree on a sharing plan before the Advisory Committee may commence its deliberations? Motorola's suggestion would appear to undermine the mandate of the Advisory Committee and perhaps render it useless. This entire notion must be rejected.

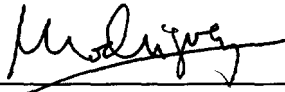
^{1/} See Comments of Litton Aero Products and Boeing Commercial Airplane Group, in CC Docket No. 92-166.

CONCLUSION

The Commission can best ensure consensus among members of the Advisory Committee if the number of members is strictly limited to bona fide affected parties. TRW is committed to participating on the Advisory Committee and to negotiating in good faith. The Commission, however, should not undermine the Committee's work by adding unnecessary parties to these negotiations.

Respectfully submitted,

TRW Inc.

By  _____

Norman P. Leventhal
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Its Attorneys

September 24, 1992

CERTIFICATE OF SERVICE

I, Kimberly A. Moats, hereby certify that the foregoing "Reply Comments of TRW Inc." were served by first-class mail, postage prepaid, this 24th day of September, 1992 on the following persons:

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